



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JN
F. #2017R01809

*271 Cadman Plaza East
Brooklyn, New York 11201*

February 5, 2018

By Hand Delivery and ECF

Mildred M. Whalen
Len H. Kamdang
Federal Defenders of New York
One Pierrepont Plaza, 16th Floor
Brooklyn, NY 11201

Re: United States v. Maksim Zaslavskiy
Criminal Docket No. 17-647 (RJD)

Dear Ms. Whalen and Mr. Kamdang:

Enclosed please find the government's discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This supplements discovery previously provided on December 21, 2017. The government also requests reciprocal discovery from the defendant. The following records are enclosed on an encrypted disc, the password for which will be emailed to you separately.

I. Documents and Tangible Objects

Enclosed please find copies of the following materials:

Description	Bates Range
Amazon records	MZ-03713 - MZ-03715
Bank of America records	MZ-03716 - MZ-03776
Go Daddy records	MZ-03777 - MZ-04470
Google records for info@drc.world, o.moiseienko@gmail.com,	MZ-04471 - MZ-04502

mzaslavskiy@gmail.com, mzaslavskiy@drc.world	
Microsoft records for mzaslavskiy@outlook.com	MZ-04503 - MZ-04665
Various web captures	MZ-04666 – MZ-04667
Verizon records for telephone number (585) 444-7444	MZ-04668 - MZ-04716
Yahoo records for drcaccounts@yahoo.in	MZ-04717 - MZ-04720

III. Future Discussions

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Please be advised that, pursuant to the policy of the Office concerning plea offers and negotiations, no plea offer is effective unless and until made in writing and signed by authorized representatives of the Office. In particular, any discussion regarding the pretrial disposition of a matter that is not reduced to writing and signed by authorized representatives of the Office cannot and does not constitute a “formal offer” or a “plea offer,” as those terms are used in Lafler v. Cooper, 132 S. Ct. 1376 (2012), and Missouri v. Frye, 132 S. Ct. 1399 (2012).

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

By: /s/ Julia Nestor
Julia Nestor
Assistant U.S. Attorney
(718) 254-6297

Enclosures

cc: Clerk of the Court (RJD) (by ECF) (without enclosures)